

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 2647

**DECLARATION OF RONALD A. ROBINS, JR., IN SUPPORT OF DEBTORS’
MOTION FOR ENTRY OF AN ORDER (I) APPROVING THE DEBTORS’
ASSUMPTION OF CERTAIN LITIGATION-RELATED AGREEMENTS AND
(II) GRANTING RELATED RELIEF**

I, Ronald A. Robins, Jr. declares as follows:

1. I am the Executive Vice President, Chief Legal & Governance Officer, General Counsel, and Corporate Secretary of Big Lots, Inc. (together with its direct and indirect subsidiaries, the “**Debtors**”, “**Big Lots**” or the “**Company**”).² I first joined Big Lots in 2015 and have held several positions with the Company since then.

2. I submit this declaration (the “**Declaration**”) in support of *Debtors’ Motion for Entry of an Order (I) Approving the Debtors’ Assumption of the Certain Litigation-Related Agreements and (II) Granting Related Relief* [D.I. 2647] (the “**Motion**”).³

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

² The Debtors do not waive by this Declaration and its contents, and hereby reserve and preserve, all privileges.

³ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

3. Except as otherwise indicated herein, all of the facts set forth in this Declaration are based on my personal knowledge, my review of the relevant documents, or information provided to me by professionals advising the Company. If called upon to testify, I could and would testify to the facts set herein on that basis. I am over the age of 18 years and am authorized to submit this Declaration.

4. Prior to the Petition Date, the Debtors entered into the Participation Agreement with Golden Mantella, LLC (“**Purchaser**”), wherein the Debtors sold an interest in the Debtors’ claims, interests, and causes of action arising from or substantially related to the Specified Litigation (the “**Litigation Assets**”). Furthermore, prior to the Petition Date, the Debtors entered into the Coordination Agreement with Purchaser, wherein the Debtors and Purchaser agreed to cooperate in connection with monetizing the Litigation Assets.

5. During these Chapter 11 Cases, the Debtors entered into, and subsequently consummated, the transactions contemplated under the GBRP APA. I understand that, pursuant to the GBRP APA, Big Lots is required to assume the Litigation-Related Agreements to ensure that the Debtors benefit from their share of the upside of the Litigation Assets. Moreover, I understand that, under the GBRP APA, the Debtors are entitled to retain 60% of any value that is realized from monetizing the Specified Proceedings (as defined in the GBRP APA), which includes the Specified Proceedings.

6. Accordingly, in light of the fact that Big Lots is required to assume the Litigation-Related Agreements, I believe that the relief sought by the Motion is in the best interests of the Debtors’ estates. Moreover, I believe that assuming the Litigation-Related Agreements will provide greater certainty to the Debtors’ estates in obtaining any future “upside” that may be realized as a result of the monetization of the Litigation Assets.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: May 19, 2025
Columbus, Ohio

By: /s/ Ronald A. Robins, Jr.
Ronald A. Robins, Jr.
Executive Vice President, Chief Legal
& Governance Officer, General
Counsel, Corporate Secretary
Big Lots, Inc.